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No. 9, Original

In the Supreme Court of the United States

OCTOBER TERM, 1980

UNITED STATES OF AMERICA, PLAINTIFF

v.

STATE OF LOUISIANA, ET AL.

(LOUISIANA BOUNDARY CASE)

SUPPLEMENTAL REPORT OF THE SPECIAL MASTER

WALTER P. ARMSTRONG, JR.
Special Master

In the Supreme Court of the United States

OCTOBER TERM, 1980

No. 9, Original

UNITED STATES OF AMERICA, PLAINTIFF

v.

STATE OF LOUISIANA, ET AL.

(LOUISIANA BOUNDARY CASE)

REPORT OF THE SPECIAL MASTER

By the Court's decree of June 16, 1975, herein, 422 U.S. 13, and its decision of April 28, 1980, 446 U.S. 253, all substantive issues in this controversy were resolved. What remained to be done was:

(1) To establish and describe lines three geograpic miles seaward of the coastlines described in the decree of June 16, 1975;

(2) To resolve the problems resulting from outstanding mineral leases embracing lands partly on one side and partly on the other side of the three-mile projection lines;

(3) To settle all accounting matters, including questions of offset, and provide for payment of remaining balances due;

(4) To terminate the present impoundment obligations of the parties under the Interim Agreement of 1956, and otherwise to bring to an end the regime mandated by that Agreement; and

(5) To formulate a final decree for entry by the Court.

The parties have been encouraged by the Special Master to resolve these matters by agreement, if possible. This has now occurred. The parties have entered into a Stipulation, filed with the Master (attached hereto), which provides for the division of "split leases" and, by ending payments from lessees in part to the sovereign no longer entitled to them, permits the final accountings to be prepared. The parties have also agreed a net balance due in respect to unimpounded receipts up to the date of the 1975 decree, and have agreed to an offset provision. And, finally, the parties have jointly drafted a proposed final decree (attached hereto) which incorporates the three-mile projection lines and provides a fixed schedule for final accountings and payments.

The Special Master has had an opportunity to review the several agreements of the parties and finds them consistent with the Court's rulings in the case. The proposed final decree seems to the Master appropriate in all respects.

Accordingly, the Special Master now recommends:

1. That the Court enter the proposed final decree appended hereto;

2. That the reference to the Special Master be continued for the purpose of entertaining any objections to the accountings required by the final decree

and, if agreement cannot be reached, submitting recommendations thereon to the Court;

3. That, unless such objections, if any, are not amicably resolved, these proceedings, so far as they relate to the controversy between the United States and the State of Louisiana, be deemed concluded without further order of the Court upon payment of the final balance provided for in Paragraph 7 of the proposed final decree and approval and payment of the Special Master's bill for expenses and compensation, and that the Special Master then be deemed discharged of his duties in this controversy.

Respectfully submitted.

/s/ Walter P. Armstrong, Jr.
WALTER P. ARMSTRONG, JR.
Special Master

June 8, 1981.

In the Supreme Court of the United States

OCTOBER TERM, 1980

No. 9, Original

UNITED STATES OF AMERICA, PLAINTIFF

v.

STATE OF LOUISIANA, ET AL.

STIPULATION

The United States of America, herein represented by its Solicitor General and the State of Louisiana, herein represented by its Attorney General, hereby stipulate as follows:

1. On and after August 1, 1981, all lessees, purchasers, and other persons responsible for payments of mineral rents, royalties or bonuses under leases covering areas of the continental shelf off the coast of Louisiana enbracing both federal and state submerged lands (hereinafter "split leases") shall be authorized and directed to cease making any payments to the party not entitled thereto on the basis of the line stipulated by the parties as representing a three-mile projection of the baseline described in Exhibit A to the Court's Decree of June 16, 1975. Beginning not later than September 1, 1981, such payments (including any sums accrued since August 1, 1981) shall be made directly to the party entitled thereto on the basis of the said three-mile projection line, and, notwithstanding any provision

of the said Decree or of the Interim Agreement of October 12, 1956, no payments made after August 1, 1981, shall be impounded or held in escrow.

2. For the purpose of apportioning rents and bonuses payable under such split leases, the payments shall be allocated on the basis of the relative acreage located on either side of the said three-mile projection line. Royalties shall be paid on the basis of the location of the well completion point on one or the other side of the said line, except as particular agreements may provide otherwise in which event such agreements shall govern.

3. Any sums due under such split leases which have already accrued but which have not been paid to either party shall, not later than September 1, 1981, be paid to the party entitled thereto on the same basis as revenues accruing after August 1, 1981. However, any obligation for interest on such sums or for severance taxes in respect of such production due to the State of Louisiana shall be unaffected by the payment of the principal sums required by this paragraph.

4. On or before January 1, 1982, all such split leases shall be divided and each of the parties shall validate and administer that portion of the outstanding lease covering areas on its side of the said three-mile projection line, or shall issue new leases on like terms covering such areas; provided that nothing in this paragraph shall be construed to require either party to validate a lapsed or expired lease or portion thereof. Notwithstanding any more restrictive provision of existing leases, the lessee shall be afforded 12 months from the date of this Stipulation to commence production from the area in paying quantities or drilling or well reworking operations there in order

to maintain the validated or new lease in force as to any area as to which the lease would otherwise lapse. However, nothing in this paragraph shall be construed to authorize the cessation of production or operations occurring on the date of this Stipulation.

5. All affected lessees, purchasers and other persons responsible for payments under such split leases shall immediately be given notice by service of a copy of the present Stipulation.

6. This Stipulation may be executed in counterpart copies and shall be effective upon execution by the duly authorized representatives of both governments.

Thus done and signed on behalf of the United States in Washington, D.C., this 5th day of June, 1981.

UNITED STATES OF AMERICA

BY: /s/ Wade H. McCree, Jr.
WADE H. MCCREE
Solicitor General

Thus done and signed on behalf of the State of Louisiana in Baton Rouge, Louisiana, this 5th day of June, 1981.

STATE OF LOUISIANA

BY: /s/ William J. Guste, Jr.
WILLIAM J. GUSTE, JR.
Attorney General

In the Supreme Court of the United States

OCTOBER TERM, 1980

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UNITED STATES OF AMERICA, PLAINTIFF

v.

STATE OF LOUISIANA

FINAL DECREE

On April 28, 1980, this Court resolved all remaining issues between the United States and the State of Louisiana and returned the case to the Special Master for a "determination of the final amount due and owing, and the method of payment." The parties have agreed upon these matters, have submitted to the Special Master a proposed final decree, and the Special Master, with the concurrence of both parties, has recommended its entry by the Court.

Accordingly,

IT IS ORDERED, ADJUDGED, AND DECREED:

1. As against the Defendant State of Louisiana and all persons claiming under it, the United States has exclusive rights to explore the area of the Continental Shelf lying seaward of the line described in Exhibit A hereof, and to exploit the natural resources of said area; the State of Louisiana is not entitled to any interest in such lands, minerals, and resources, except as may be provided by 43 U.S.C. 1337(g),

and said State, its privies, assigns, lessees, and other persons claiming under it are hereby enjoined from interfering with the rights of the United States in such lands, minerals and resources.

2. As against the plaintiff United States and all persons claiming under it, the State of Louisiana has exclusive rights to explore the area lying shoreward of the line described in Exhibit A hereof, and to exploit the natural resources of said area, with the exceptions provided by Section 5 of the Submerged Lands Act, 67 Stat. 32, 43 U.S.C. § 1313; the United States is not entitled to any interest in such lands, minerals, and resources and said United States, its privies, assigns, lessees and other persons claiming under it are hereby enjoined from interfering with the rights of the State of Louisiana in such lands, minerals and resources.

3. The line described in Exhibit A hereof is a line three geographic miles seaward of the coastline described in Exhibit A to the Decree of June 16, 1975 (422 U.S. 13, 19-32). Except as otherwise provided for limited past periods by paragraph 10 and Exhibit B of the said Decree of June 16, 1975, these two lines shall supercede all prior descriptions and be deemed to define the coastline and its three-mile projection for all periods present and past. Moreover, until and unless superceded by a subsequent final decree of this Court or agreement of the parties, the line described in Exhibit A hereof shall remain in effect for all purposes relevant to the Submerged Lands Act, 43 U.S.C. 1301-1315, including exploitation of mineral resources; and, with respect to any period during which this line remains in effect, neither party shall ever be held to account to the other for or reimburse the other for any revenues derived from

or attributable to sales, leases, licenses or exploitation of lands, minerals or resources adjudicated to that party by paragraph 1 or paragraph 2 hereof.

4. All prior accountings, claims and objections affecting the liability of one party to the other with respect to revenues derived from exploitation of offshore submerged lands and resources before June 16, 1975, and not impounded pursuant to the Interim Agreement of October 12, 1956, have been resolved. However, notwithstanding anything to the contrary in any previous decree of this Court or in the Interim Agreement of October 12, 1956, this net balance shall not be payable until the accountings provided for in paragraphs 5 and 6 hereof shall have been filed and settled, and the said net balance shall be subject to offset against the liability resulting from those accountings.

5. Not later than December 1, 1981, the State of Louisiana shall render to the United States and file with the Court a true, full and accurate account of all revenues, other than severance taxes, pipeline rentals, and administrative charges, derived from or attributable to the exploitation of lands, minerals or resources within the area described in paragraph 1 hereof since June 16, 1975. Where such revenues are derived from leases embracing areas on both sides of the line described in Exhibit A hereof, they shall be apportioned as follows: as to bonuses and rentals, on the basis of relative acreage; as to royalties, on the basis of the location of the well completion point, except when an outstanding agreement between the parties specifies a different basis of allocation which, in that event, shall govern.

6. Not later than December 1, 1981, the United States shall render to the State of Louisiana and file

with the Court a true, full and accurate accounting of all revenues, other than pipeline rentals and administrative charges, which remain impounded pursuant to the Interim Agreement of October 12, 1956, and which are derived from or attributable to the exploitation of lands, minerals or resources within the area described in paragraph 2 hereof or, for the limited periods there specified, areas landward of the lines described in Exhibit B hereof. The allocation of revenues from leases embracing areas on both sides of the line described in Exhibit A hereof or, for the relevant periods, Exhibit B hereof, shall be on the same basis as set forth in paragraph 5 hereof.

7. Any objections to the accounting required by paragraphs 5 and 6 hereof shall be filed with the Court and served on the other party not later than January 1, 1982. Immediately after January 1, 1982, any undisputed net balance resulting from the unchallenged portions of the accountings required by paragraphs 5 and 6 hereof and the liability specified in paragraph 4 hereof, shall be paid by the party whose net liability is greater to the other party, notwithstanding any outstanding objections as to other portions of the accountings and notwithstanding any provisions barring offsets in prior decrees or the Interim Agreement of October 12, 1956. Any remaining net balance shall be paid promptly after objections are resolved.

8. Nothing in this decree shall affect the rights or obligations of either party with respect to its lessees or other third parties, whether arising from the Interim Agreement of October 12, 1956, or otherwise. Nor shall anything in this Decree affect any rights or obligations arising under present or future unitization, operating, enhanced recovery, comming-

ling, or other similar agreements between the parties or with others.

9. Nothing in this Decree or in the proceedings leading to it shall prejudice any rights, claims or defenses of the State of Louisiana as to its maritime lateral boundaries with any other state, which boundaries are not at issue in this litigation, nor shall the United States in any way be prejudiced hereby as to such matters.

10. The Court retains jurisdiction to entertain such further proceedings, enter such orders and issue such writs as may from time to time be deemed necessary or advisable to resolve any disputes that may arise over the accountings provided for in this decree, and to give proper force and effect to its previous orders or decrees herein or to this decree. In all other respects, this is a final decree; and the Interim Agreement of October 12, 1956, is terminated for all purposes as of 5 P.M. on the first day of January, 1982, or the date on which any objections to accountings are finally resolved.

EXHIBIT A

	X	Y
BEGINNING AT	2769357	575650
BY STRAIGHT LINE TO	2790258	526390
BY ARC CENTERED AT	2779032	512013
TO	2791385	525434
BY STRAIGHT LINE TO	2793119	523838
BY ARC CENTERED AT	2780766	510417
TO	2794594	522313
BY STRAIGHT LINE TO	2795887	520810
BY ARC CENTERED AT	2782059	508914
TO	2796579	519954
BY STRAIGHT LINE TO	2799209	516495
BY ARC CENTERED AT	2784689	505455
TO	2800441	514653
BY STRAIGHT LINE TO	2804270	508096
BY ARC CENTERED AT	2788518	498898
TO	2804495	507699
BY STRAIGHT LINE TO	2806028	504916
BY ARC CENTERED AT	2790051	496115
TO	2807014	502822
BY STRAIGHT LINE TO	2808653	498677
BY ARC CENTERED AT	2791690	491970
TO	2809151	497245
BY STRAIGHT LINE TO	2812250	486987
BY ARC CENTERED AT	2794789	481712
TO	2812519	485996
BY STRAIGHT LINE TO	2813932	480148
BY ARC CENTERED AT	2796202	475864
TO	2814262	478425
BY STRAIGHT LINE TO	2815269	471324
BY ARC CENTERED AT	2797209	468763
TO	2815426	469688
BY STRAIGHT LINE TO	2815673	464823

	X	Y
BY ARC CENTERED AT	2797456	463898
TO	2815697	463895
BY STRAIGHT LINE TO	2815696	458116
BY ARC CENTERED AT	2797455	458119
TO	2815657	456928
BY STRAIGHT LINE TO	2815269	450999
BY ARC CENTERED AT	2797067	452190
TO	2815171	449960
BY STRAIGHT LINE TO	2813957	440103
BY ARC CENTERED AT	2795853	442333
TO	2813809	439123
BY STRAIGHT LINE TO	2812678	432796
BY ARC CENTERED AT	2794722	436006
TO	2812419	431584
BY STRAIGHT LINE TO	2810957	425733
BY ARC CENTERED AT	2793260	430155
TO	2810699	424807
BY STRAIGHT LINE TO	2807854	415530
BY ARC CENTERED AT	2790415	420878
TO	2807572	414684
BY STRAIGHT LINE TO	2805322	408452
BY ARC CENTERED AT	2788165	414646
TO	2805227	408196
BY STRAIGHT LINE TO	2803786	404384
BY ARC CENTERED AT	2786724	410834
TO	2803319	403263
BY STRAIGHT LINE TO	2799845	395648
BY ARC CENTERED AT	2783250	403219
TO	2798971	393968
BY STRAIGHT LINE TO	2795394	387889
BY ARC CENTERED AT	2779673	397140
TO	2795311	387750
BY STRAIGHT LINE TO	2793560	384834
BY ARC CENTERED AT	2777922	394224
TO	2792249	382934

	X	Y
BY STRAIGHT LINE TO	2790814	381113
BY ARC CENTERED AT	2776487	392403
TO	2789360	379480
BY ARC CENTERED AT	2774670	390293
TO	2788262	378129
BY STRAIGHT LINE TO	2786553	375045
BY ARC CENTERED AT	2770599	383887
TO	2785045	372750
BY STRAIGHT LINE TO	2783942	371319
BY STRAIGHT LINE TO	2783792	371062
BY ARC CENTERED AT	2768031	380244
TO	2780548	366976
BY STRAIGHT LINE TO	2775735	360553
BY ARC CENTERED AT	2761138	371491
TO	2775111	359766
BY STRAIGHT LINE TO	2773031	357287
BY ARC CENTERED AT	2757465	366796
TO	2771721	355417
BY STRAIGHT LINE TO	2770633	354054
BY STRAIGHT LINE TO	2770505	353847
BY ARC CENTERED AT	2755015	363480
TO	2767788	350458
BY STRAIGHT LINE TO	2761994	34473
BY ARC CENTERED AT	2749221	35797
TO	2760703	43624
BY STRAIGHT LINE TO	2757791	341265
BY ARC CENTERED AT	274630	355438
TO	2756 2	339999
BY STRAIGHT LINE TO	275136	338812
BY STRAIGHT LINE TO	742173	323079
BY ARC CENTERED AT	2727653	334120
TO	2741983	322834

	X	Y
BY STRAIGHT LINE TO	2741182	321817
BY ARC CENTERED AT	2726852	333103
TO	2738042	318698
BY STRAIGHT LINE TO	2736381	317408
BY STRAIGHT LINE TO	2736060	316935
BY STRAIGHT LINE TO	2732627	311249
BY ARC CENTERED AT	2717012	320677
TO	2731416	309486
BY STRAIGHT LINE TO	2729640	307200
BY ARC CENTERED AT	2715236	318391
TO	2728702	306088
BY STRAIGHT LINE TO	2728099	305428
BY ARC CENTERED AT	2714633	317731
TO	2725197	302861
BY STRAIGHT LINE TO	2723888	301931
BY ARC CENTERED AT	2713324	316801
TO	2720770	300149
BY STRAIGHT LINE TO	2719218	299455
BY ARC CENTERED AT	2711772	316107
TO	2714238	298034
BY STRAIGHT LINE TO	2704480	294684
BY STRAIGHT LINE TO	2704099	293666
BY ARC CENTERED AT	2687014	300054
TO	2701338	288761
BY STRAIGHT LINE TO	2699382	286280
BY ARC CENTERED AT	2685058	297573
TO	2697436	284175
BY STRAIGHT LINE TO	2699302	266715
BY ARC CENTERED AT	2688235	252215
TO	2704468	260534
BY ARC CENTERED AT	2689305	250395
TO	2707507	251577
BY ARC CENTERED AT	2700735	234640
TO	2717908	240788

	X	Y
BY ARC CENTERED AT	2701500	232820
TO	2719022	237890
BY ARC CENTERED AT	2707635	223640
TO	2721632	235337
BY STRAIGHT LINE TO	2736873	228413
BY ARC CENTERED AT	2738320	210230
TO	2745585	226961
BY ARC CENTERED AT	2738938	209975
TO	2749646	224742
BY ARC CENTERED AT	2750755	206535
TO	2759837	222354
BY ARC CENTERED AT	2755325	204680
TO	2773229	201192
BY ARC CENTERED AT	2755178	203815
TO	2770763	194337
BY ARC CENTERED AT	2754100	186915
TO	2771780	191404
BY ARC CENTERED AT	2754263	186316
TO	2772100	182502
BY ARC CENTERED AT	2753885	183460
TO	2765449	169354
BY ARC CENTERED AT	2752470	182170
TO	2761213	166161
BY ARC CENTERED AT	2751045	181305
TO	2752202	163101
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TO	2749611	163055
BY ARC CENTERED AT	2736662	175902
TO	2748316	161869
BY ARC CENTERED AT	2734720	174030
TO	2747824	161341
BY STRAIGHT LINE TO	2746249	159715
BY ARC CENTERED AT	2728153	162005

	X	Y
TO	2746094	158715
BY STRAIGHT LINE TO	2745156	153600
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TO	2745054	153083
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TO	2743622	143444
BY ARC CENTERED AT	2726105	148530
TO	2731258	131033
BY STRAIGHT LINE TO	2717872	114220
BY ARC CENTERED AT	2699815	116800
TO	2711432	102737
BY ARC CENTERED AT	2699695	116700
TO	2694008	99369
BY ARC CENTERED AT	2697850	117200
TO	2683320	106173
BY STRAIGHT LINE TO	2682980	106621
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TO	2679799	113283
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TO	2679155	116635
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TO	2670977	122536
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TO	2656150	118421
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TO	2648682	111038
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BY STRAIGHT LINE TO	2648531	110887
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TO	2646250	106981

	X	Y
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TO	2642494	101278
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BY ARC CENTERED AT	2624995	108700
TO	2638408	96339
BY STRAIGHT LINE TO	2638210	96123
BY STRAIGHT LINE TO	2637530	95377
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TO	2637471	95312
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BY ARC CENTERED AT	2621925	105355
TO	2634923	92558
BY STRAIGHT LINE TO	2633653	91268
BY ARC CENTERED AT	2620655	104065
TO	2631973	89760
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TO	2630068	87661
BY STRAIGHT LINE TO	2629389	86821
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BY STRAIGHT LINE TO	2624340	80576
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TO	2621555	77806
BY STRAIGHT LINE TO	2621180	77506
BY ARC CENTERED AT	2609785	91750
TO	2617996	75462
BY STRAIGHT LINE TO	2617391	75157
BY ARC CENTERED AT	2609180	91445
TO	2597416	77505
BY STRAIGHT LINE TO	2595526	79100
BY ARC CENTERED AT	2607290	93040
TO	2589664	97736

	X	Y
BY ARC CENTERED AT	2607455	93710
TO	2591541	102625
BY STRAIGHT LINE TO	2592751	104785
BY ARC CENTERED AT	2608665	95870
TO	2593838	106495
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TO	2597233	117130
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TO	2596949	156969
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TO	2595312	165072
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TO	2594008	166625
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TO	2590016	172111
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TO	2587325	177913
BY STRAIGHT LINE TO	2586460	180038
BY ARC CENTERED AT	2603355	186915
TO	2585856	181767
BY ARC CENTERED AT	2602425	189395
TO	2585513	182560
BY STRAIGHT LINE TO	2585309	183065
BY STRAIGHT LINE TO	2585048	183583
BY STRAIGHT LINE TO	2584220	184785

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TO	2581526	187531
BY ARC CENTERED AT	2589100	204125
TO	2579034	188914
BY STRAIGHT LINE TO	2577635	189839
BY ARC CENTERED AT	2583790	207010
TO	2576863	190136
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BY ARC CENTERED AT	2576174	209790
TO	2567200	193910
BY ARC CENTERED AT	2574890	210450
TO	2566472	194268
BY STRAIGHT LINE TO	2564469	194807
BY ARC CENTERED AT	2565940	212988
TO	2559750	195830
BY STRAIGHT LINE TO	2559112	196060
BY ARC CENTERED AT	2562149	214046
TO	2557272	196470
BY STRAIGHT LINE TO	2557019	196540
BY STRAIGHT LINE TO	2552324	197553
BY ARC CENTERED AT	2556172	215383
TO	2551363	197788
BY STRAIGHT LINE TO	2414967	172673
BY STRAIGHT LINE TO	2410270	168699
BY STRAIGHT LINE TO	2406006	164749
BY ARC CENTERED AT	2393610	178130
TO	2404972	163860
BY STRAIGHT LINE TO	2397195	157668
BY ARC CENTERED AT	2385833	171938
TO	2396858	157406
BY STRAIGHT LINE TO	2392712	154261
BY STRAIGHT LINE TO	2389824	151968

	X	Y
BY ARC CENTERED AT	2376485	164409
TO	2387438	149823
BY STRAIGHT LINE TO	2385828	148614
BY ARC CENTERED AT	2374875	163200
TO	2382739	146742
BY STRAIGHT LINE TO	2382463	146610
BY STRAIGHT LINE TO	2379481	144718
BY ARC CENTERED AT	2369709	160120
TO	2378913	144372
BY STRAIGHT LINE TO	2376899	143195
BY ARC CENTERED AT	2367695	158943
TO	2374967	142215
BY STRAIGHT LINE TO	2373712	141669
BY ARC CENTERED AT	2364392	157349
TO	2367743	139419
BY STRAIGHT LINE TO	2365248	138185
BY ARC CENTERED AT	2354070	152599
TO	2349744	134879
BY STRAIGHT LINE TO	2348372	134394
BY STRAIGHT LINE TO	2346096	133534
BY ARC CENTERED AT	2339651	150598
TO	2344530	133022
BY STRAIGHT LINE TO	2342882	132565
BY STRAIGHT LINE TO	2341883	132218
BY STRAIGHT LINE TO	2334775	129342
BY ARC CENTERED AT	2327933	146251
TO	2333794	128978
BY STRAIGHT LINE TO	2328327	127123
BY ARC CENTERED AT	2322466	144396
TO	2326959	126717
BY STRAIGHT LINE TO	2326906	126704
BY ARC CENTERED AT	2319608	143421
TO	2324588	125873
BY STRAIGHT LINE TO	2322643	125321

BEST A

	X	Y
BY ARC CENTERED AT	2317663	142869
TO	2322368	125246
BY STRAIGHT LINE TO	2318607	124242
BY ARC CENTERED AT	2313902	141865
TO	2314460	123633
BY STRAIGHT LINE TO	2312762	123581
BY ARC CENTERED AT	2312204	141813
TO	2311215	123599
BY STRAIGHT LINE TO	2309557	123689
BY ARC CENTERED AT	2310546	141903
TO	2308711	123755
BY ARC CENTERED AT	2300326	139954
TO	2308388	123592
BY STRAIGHT LINE TO	2306600	122711
BY ARC CENTERED AT	2298538	139073
TO	2302489	121265
BY STRAIGHT LINE TO	2299992	120711
BY ARC CENTERED AT	2296041	138519
TO	2295411	120289
BY STRAIGHT LINE TO	2294514	120320
BY ARC CENTERED AT	2295144	138550
TO	2288532	121550
BY STRAIGHT LINE TO	2287771	121846
BY ARC CENTERED AT	2294383	138846
TO	2287412	121990
BY STRAIGHT LINE TO	2284138	122399
BY ARC CENTERED AT	2286402	140499
TO	2283007	122577
BY STRAIGHT LINE TO	2277807	123562
BY ARC CENTERED AT	2281202	141484
TO	2276614	123830
BY STRAIGHT LINE TO	2270161	125507
BY ARC CENTERED AT	2274749	143161

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	X	Y
TO	2267618	126372
BY STRAIGHT LINE TO	2263074	128302
BY ARC CENTERED AT	2270205	145091
TO	2262736	128450
BY STRAIGHT LINE TO	2256981	131033
BY ARC CENTERED AT	2264450	147674
TO	2255335	131874
BY STRAIGHT LINE TO	2251881	133867
BY STRAIGHT LINE TO	2250291	134590
BY STRAIGHT LINE TO	2229997	129637
BY STRAIGHT LINE TO	2228299	128761
BY ARC CENTERED AT	2219935	144971
TO	2227466	128358
BY STRAIGHT LINE TO	2225677	127547
BY ARC CENTERED AT	2218146	144160
TO	2222547	126458
BY STRAIGHT LINE TO	2219572	125719
BY STRAIGHT LINE TO	2212203	123742
BY STRAIGHT LINE TO	2203722	121100
BY ARC CENTERED AT	2198296	138515
TO	2202941	120876
BY STRAIGHT LINE TO	2196975	119305
BY ARC CENTERED AT	2192330	136944
TO	2195302	118947
BY STRAIGHT LINE TO	2189988	118070
BY STRAIGHT LINE TO	2188596	117772
BY ARC CENTERED AT	2184788	135611
TO	2185156	117374
BY ARC CENTERED AT	2182166	135368
TO	2181100	117159
BY STRAIGHT LINE TO	2179579	117248
BY ARC CENTERED AT	2180645	135457
TO	2177979	117412
BY STRAIGHT LINE TO	2172700	117308

	X	Y
BY STRAIGHT LINE TO	2171638	117082
BY ARC CENTERED AT	2167836	134922
TO	2168753	116704
BY STRAIGHT LINE TO	2165394	116535
BY ARC CENTERED AT	2164477	134753
TO	2160352	116985
BY STRAIGHT LINE TO	2156273	117355
BY ARC CENTERED AT	2157920	135521
TO	2154346	117634
BY ARC CENTERED AT	2155349	135847
TO	2149793	118473
BY ARC CENTERED AT	2147751	136599
TO	2149162	118413
BY STRAIGHT LINE TO	2145000	118090
BY ARC CENTERED AT	2143589	136276
TO	2143589	118035
BY STRAIGHT LINE TO	2139529	118035
BY ARC CENTERED AT	2139529	136276
TO	2137975	118102
BY STRAIGHT LINE TO	2136677	118213
BY ARC CENTERED AT	2138231	136387
TO	2134698	118492
BY ARC CENTERED AT	2134210	136726
TO	2130790	118809
BY STRAIGHT LINE TO	2129669	119023
BY ARC CENTERED AT	2133089	136940
TO	2126158	120067
BY STRAIGHT LINE TO	2122637	121514
BY STRAIGHT LINE TO	2122091	121684
BY STRAIGHT LINE TO	2118740	122394
BY ARC CENTERED AT	2122523	140238
TO	2114776	123724
BY STRAIGHT LINE TO	2111082	125457

	X	Y
BY ARC CENTERED AT	2118829	141971
TO	2108033	127268
BY STRAIGHT LINE TO	2107269	127829
BY ARC CENTERED AT	2118065	142532
TO	2103682	131314
BY STRAIGHT LINE TO	2102934	132273
BY ARC CENTERED AT	2117317	143491
TO	2112203	161000
BY STRAIGHT LINE TO	2112518	161092
BY ARC CENTERED AT	2117632	143583
TO	2119073	161767
BY ARC CENTERED AT	2131078	175500
TO	2117168	163700
BY ARC CENTERED AT	2128430	178049
TO	2116319	164410
BY ARC CENTERED AT	2127239	179020
TO	2116191	164506
BY ARC CENTERED AT	2124878	180545
TO	2114372	165634
BY ARC CENTERED AT	2111697	183677
TO	2110623	165468
BY ARC CENTERED AT	2106412	183216
TO	2102599	165378
BY ARC CENTERED AT	2103313	183605
TO	2095246	167245
BY ARC CENTERED AT	2098954	185105
TO	2095140	167268
BY STRAIGHT LINE TO	2087218	168962
BY ARC CENTERED AT	2086261	187177
TO	2082361	169358
BY STRAIGHT LINE TO	2081470	169553
BY ARC CENTERED AT	2085370	187372
TO	2076984	171174
BY ARC CENTERED AT	2077417	189409

	X	Y
TO	2071846	172040
BY STRAIGHT LINE TO	2070630	172430
BY ARC CENTERED AT	2076201	189799
TO	2064747	175603
BY STRAIGHT LINE TO	2063841	176334
BY ARC CENTERED AT	2075295	190530
TO	2059951	180668
BY ARC CENTERED AT	2071131	195080
TO	2058843	181599
BY ARC CENTERED AT	2062055	199555
TO	2057134	181991
BY STRAIGHT LINE TO	2053779	182931
BY ARC CENTERED AT	2058700	200495
TO	2053474	183019
BY STRAIGHT LINE TO	2052967	183053
BY STRAIGHT LINE TO	2051871	183006
BY ARC CENTERED AT	2051090	201230
TO	2050845	182991
BY STRAIGHT LINE TO	2048985	183016
BY ARC CENTERED AT	2049230	201255
TO	2048033	183054
BY STRAIGHT LINE TO	2044865	183262
BY STRAIGHT LINE TO	2041482	183446
BY ARC CENTERED AT	2042475	201660
TO	2037473	184119
BY STRAIGHT LINE TO	2033139	185355
BY STRAIGHT LINE TO	2032934	185387
BY ARC CENTERED AT	2035775	203405
TO	2029791	186174
BY STRAIGHT LINE TO	2027401	187004
BY ARC CENTERED AT	2033385	204235
TO	2026834	187211
BY STRAIGHT LINE TO	2023510	188491
BY STRAIGHT LINE TO	2020959	189327

	X	Y
BY ARC CENTERED AT	2026640	206660
TO	2019190	190010
BY STRAIGHT LINE TO	2016613	191163
BY STRAIGHT LINE TO	2015796	191414
BY ARC CENTERED AT	2021155	208850
TO	2013823	192148
BY STRAIGHT LINE TO	2010121	193773
BY ARC CENTERED AT	2017453	210475
TO	2007660	195086
BY STRAIGHT LINE TO	2006450	195856
BY ARC CENTERED AT	2016243	211245
TO	2002812	198903
BY STRAIGHT LINE TO	2001329	200516
BY STRAIGHT LINE TO	1998627	203119
BY STRAIGHT LINE TO	1996877	204647
BY ARC CENTERED AT	2008873	218388
TO	1994484	207177
BY STRAIGHT LINE TO	1993669	208223
BY ARC CENTERED AT	2008058	219434
TO	1992024	210737
BY STRAIGHT LINE TO	1991724	211291
BY STRAIGHT LINE TO	1991392	211653
BY STRAIGHT LINE TO	1987527	215292
BY ARC CENTERED AT	2000030	228573
TO	1985881	217061
BY STRAIGHT LINE TO	1984419	218858
BY ARC CENTERED AT	1998568	230370
TO	1982726	221329
BY STRAIGHT LINE TO	1981279	223864
BY ARC CENTERED AT	1987818	240892
TO	1975782	227186
BY ARC CENTERED AT	1987371	241272
TO	1972054	231367
BY STRAIGHT LINE TO	1937446	246505

	X	Y
BY ARC CENTERED AT	1933172	264238
TO	1920501	251117
BY ARC CENTERED AT	1924399	268936
TO	1916888	252314
BY ARC CENTERED AT	1914373	270380
TO	1900989	257987
BY ARC CENTERED AT	1896827	275747
TO	1895100	257588
BY ARC CENTERED AT	1882306	270590
TO	1867537	259884
BY ARC CENTERED AT	1872418	277460
TO	1858534	265630
BY ARC CENTERED AT	1843467	275912
TO	1848729	258447
BY ARC CENTERED AT	1835344	270839
TO	1841538	253682
BY ARC CENTERED AT	1834019	270301
TO	1817077	263541
BY ARC CENTERED AT	1833527	271423
TO	1815531	274401
BY ARC CENTERED AT	1820994	291804
TO	1808997	278064
BY ARC CENTERED AT	1809845	296285
TO	1792971	289357
BY ARC CENTERED AT	1791584	307545
TO	1773422	305849
BY ARC CENTERED AT	1783067	321331
TO	1771284	307407
BY ARC CENTERED AT	1782391	321876
TO	1769317	309156
BY ARC CENTERED AT	1778769	324757
TO	1763172	315299
BY ARC CENTERED AT	1763190	333540
TO	1762008	315338

	X	Y
BY STRAIGHT LINE TO	1761238	315388
BY ARC CENTERED AT	1762420	333590
TO	1761004	315404
BY ARC CENTERED AT	1758630	333490
TO	1751585	316665
BY STRAIGHT LINE TO	1749527	316597
BY STRAIGHT LINE TO	1745678	316238
BY STRAIGHT LINE TO	1741757	315745
BY STRAIGHT LINE TO	1738098	314155
BY ARC CENTERED AT	1730831	330886
TO	1737269	313819
BY STRAIGHT LINE TO	1733962	312572
BY STRAIGHT LINE TO	1733065	312110
BY ARC CENTERED AT	1724713	328326
TO	1729983	310863
BY STRAIGHT LINE TO	1729557	310735
BY STRAIGHT LINE TO	1727510	309315
BY ARC CENTERED AT	1717114	324303
TO	1726647	308752
BY STRAIGHT LINE TO	1721463	305574
BY STRAIGHT LINE TO	1721351	305467
BY ARC CENTERED AT	1708756	318661
TO	1715565	301739
BY STRAIGHT LINE TO	1713599	300948
BY ARC CENTERED AT	1706790	317870
TO	1711471	300240
BY STRAIGHT LINE TO	1707761	299255
BY ARC CENTERED AT	1703080	316885
TO	1706765	299020
BY STRAIGHT LINE TO	1704365	298525
BY ARC CENTERED AT	1700680	316390
TO	1702465	298237
BY STRAIGHT LINE TO	1698144	297812
BY ARC CENTERED AT	1696359	315965

	X	Y
TO	1696239	297725
BY STRAIGHT LINE TO	1692448	297750
BY ARC CENTERED AT	1692568	315990
TO	1691302	297793
BY STRAIGHT LINE TO	1688714	297973
BY ARC CENTERED AT	1689980	316170
TO	1687709	298071
BY STRAIGHT LINE TO	1684999	298411
BY ARC CENTERED AT	1687270	316510
TO	1683393	298686
BY STRAIGHT LINE TO	1674668	300584
BY ARC CENTERED AT	1678545	318408
TO	1674182	300697
BY STRAIGHT LINE TO	1670983	301485
BY ARC CENTERED AT	1675346	319196
TO	1670472	301619
BY STRAIGHT LINE TO	1666144	302819
BY ARC CENTERED AT	1671018	320396
TO	1665216	303103
BY STRAIGHT LINE TO	1663698	303612
BY STRAIGHT LINE TO	1662427	303960
BY STRAIGHT LINE TO	1661678	304151
BY STRAIGHT LINE TO	1659494	304616
BY ARC CENTERED AT	1663290	322457
TO	1659476	304620
BY STRAIGHT LINE TO	1658120	304910
BY ARC CENTERED AT	1658887	323134
TO	1656354	305070
BY ARC CENTERED AT	1655896	323305
TO	1652650	305356
BY STRAIGHT LINE TO	1650184	305802
BY ARC CENTERED AT	1653430	323751
TO	1648635	306152
BY STRAIGHT LINE TO	1647051	306584

	X	Y
BY ARC CENTERED AT	1649308	324684
TO	1643681	307333
BY STRAIGHT LINE TO	1636292	308607
BY STRAIGHT LINE TO	1627130	309897
BY STRAIGHT LINE TO	1620757	310390
BY ARC CENTERED AT	1622420	328555
TO	1619895	310490
BY STRAIGHT LINE TO	1614565	311235
BY ARC CENTERED AT	1617090	329300
TO	1613148	311491
BY STRAIGHT LINE TO	1611814	311591
BY ARC CENTERED AT	1613190	329780
TO	1609960	311828
BY STRAIGHT LINE TO	1606070	312528
BY ARC CENTERED AT	1609300	330480
TO	1604702	312829
BY STRAIGHT LINE TO	1604290	312866
BY ARC CENTERED AT	1605965	331030
TO	1601325	313389
BY STRAIGHT LINE TO	1601195	313403
BY ARC CENTERED AT	1603140	331540
TO	1598672	313855
BY STRAIGHT LINE TO	1596370	314437
BY STRAIGHT LINE TO	1596179	314483
BY STRAIGHT LINE TO	1592424	315063
BY ARC CENTERED AT	1595210	333090
TO	1591479	315235
BY ARC CENTERED AT	1594075	333290
TO	1589694	315583
BY ARC CENTERED AT	1593010	333520
TO	1589433	315634
BY STRAIGHT LINE TO	1588108	315899
BY ARC CENTERED AT	1591685	333785
TO	1585928	316477

	X	Y
BY STRAIGHT LINE TO	1584286	317023
BY STRAIGHT LINE TO	1582201	317563
BY ARC CENTERED AT	1586780	335220
TO	1581596	317732
BY STRAIGHT LINE TO	1576266	319312
BY ARC CENTERED AT	1581450	336800
TO	1575360	319606
BY STRAIGHT LINE TO	1570080	321476
BY ARC CENTERED AT	1576170	338670
TO	1569889	321545
BY STRAIGHT LINE TO	1565349	323210
BY ARC CENTERED AT	1571630	340335
TO	1563529	323992
BY STRAIGHT LINE TO	1563104	324202
BY STRAIGHT LINE TO	1561073	324994
BY ARC CENTERED AT	1567695	341990
TO	1558882	326020
BY STRAIGHT LINE TO	1558879	326021
BY ARC CENTERED AT	1564160	343480
TO	1556225	327056
BY STRAIGHT LINE TO	1556066	327133
BY STRAIGHT LINE TO	1553511	327894
BY ARC CENTERED AT	1558720	345375
TO	1551769	328511
BY STRAIGHT LINE TO	1549575	329415
BY ARC CENTERED AT	1553840	347150
TO	1546081	330642
BY STRAIGHT LINE TO	1543911	331662
BY ARC CENTERED AT	1551670	348170
TO	1541402	333094
BY STRAIGHT LINE TO	1540011	333646
BY ARC CENTERED AT	1546740	350600
TO	1537927	334630
BY STRAIGHT LINE TO	1531757	337418

	X	Y
BY ARC CENTERED AT	1539270	354040
TO	1530263	338178
BY STRAIGHT LINE TO	1527498	339748
BY ARC CENTERED AT	1536505	355610
TO	1526511	340351
BY STRAIGHT LINE TO	1526495	340356
BY ARC CENTERED AT	1532515	357575
TO	1523959	341466
BY ARC CENTERED AT	1531240	358190
TO	1522813	342013
BY STRAIGHT LINE TO	1516478	345313
BY STRAIGHT LINE TO	1505572	350398
BY ARC CENTERED AT	1513280	366930
TO	1504778	350792
BY STRAIGHT LINE TO	1493968	356487
BY ARC CENTERED AT	1502470	372625
TO	1493740	356609
BY STRAIGHT LINE TO	1488240	359607
BY STRAIGHT LINE TO	1483855	361809
BY ARC CENTERED AT	1492040	378110
TO	1483320	362089
BY STRAIGHT LINE TO	1481464	363099
BY STRAIGHT LINE TO	1472522	367321
BY STRAIGHT LINE TO	1464632	370389
BY ARC CENTERED AT	1471240	387390
TO	1464433	370467
BY STRAIGHT LINE TO	1461367	371700
BY STRAIGHT LINE TO	1455041	373829
BY STRAIGHT LINE TO	1449142	375498
BY ARC CENTERED AT	1454105	393050
TO	1447394	376089
BY STRAIGHT LINE TO	1443224	377739
BY ARC CENTERED AT	1449935	394700
TO	1442769	377926

	X	Y
BY STRAIGHT LINE TO	1437906	380003
BY STRAIGHT LINE TO	1435142	381048
BY STRAIGHT LINE TO	1431147	382502
BY ARC CENTERED AT	1431465	400740
TO	1426148	383291
BY STRAIGHT LINE TO	1423703	384036
BY ARC CENTERED AT	1429020	401485
TO	1421665	384793
BY STRAIGHT LINE TO	1421218	384903
BY ARC CENTERED AT	1425600	402610
TO	1417428	386302
BY STRAIGHT LINE TO	1411695	388054
BY STRAIGHT LINE TO	1406675	389181
BY STRAIGHT LINE TO	1400158	390267
BY STRAIGHT LINE TO	1395815	390681
BY STRAIGHT LINE TO	1390919	390971
BY ARC CENTERED AT	1392000	409180
TO	1390575	390995
BY STRAIGHT LINE TO	1386958	390977
BY STRAIGHT LINE TO	1385797	390942
BY STRAIGHT LINE TO	1383281	390516
BY ARC CENTERED AT	1380235	408500
TO	1382827	390444
BY STRAIGHT LINE TO	1380530	390115
BY STRAIGHT LINE TO	1379793	389887
BY ARC CENTERED AT	1363392	397870
TO	1364288	379651
BY STRAIGHT LINE TO	1363312	379603
BY ARC CENTERED AT	1362416	397822
TO	1348021	386619
BY STRAIGHT LINE TO	1347740	386685
BY STRAIGHT LINE TO	1339580	387874
BY STRAIGHT LINE TO	1332310	388694
BY STRAIGHT LINE TO	1328041	388886

	X	Y
BY STRAIGHT LINE TO	1323345	388897
BY STRAIGHT LINE TO	1318623	388814
BY STRAIGHT LINE TO	1313961	388548
BY STRAIGHT LINE TO	1309176	388114
BY STRAIGHT LINE TO	1299212	386972
BY STRAIGHT LINE TO	1294264	386189
BY ARC CENTERED AT	1291413	404205
TO	1293948	386141
BY STRAIGHT LINE TO	1288689	385403
BY ARC CENTERED AT	1286154	403467
TO	1288273	385350
BY STRAIGHT LINE TO	1282879	384719
BY ARC CENTERED AT	1280760	402836
TO	1282343	384664
BY STRAIGHT LINE TO	1277050	384203
BY ARC CENTERED AT	1275467	402375
TO	1276974	384197
BY STRAIGHT LINE TO	1266567	383334
BY STRAIGHT LINE TO	1261754	382855
BY STRAIGHT LINE TO	1256845	382176
BY STRAIGHT LINE TO	1252082	381444
BY STRAIGHT LINE TO	1247120	380489
BY ARC CENTERED AT	1243670	398400
TO	1246626	380401
BY STRAIGHT LINE TO	1243866	379947
BY STRAIGHT LINE TO	1240511	379144
BY STRAIGHT LINE TO	1238894	378640
BY STRAIGHT LINE TO	1234692	377218
BY ARC CENTERED AT	1228846	394497
TO	1233981	376994
BY ARC CENTERED AT	1225768	393281
TO	1230677	375713
BY STRAIGHT LINE TO	1229077	374980
BY ARC CENTERED AT	1219065	390227

	X	Y
TO	1227371	373987
BY STRAIGHT LINE TO	1226185	373381
BY STRAIGHT LINE TO	1227214	367277
BY ARC CENTERED AT	1209227	364245
TO	1214918	346915
BY STRAIGHT LINE TO	1213304	346385
BY STRAIGHT LINE TO	1212404.23	346089.54

SAID POINT BEING ON THE
TEXAS-LOUISIANA BOUNDARY

EXHIBIT B

From January, 1961 to December 6, 1969, the three-mile projection line in East Bay vicinity from base line point X = 2,702,461; Y = 124,148 to a baseline point X = 2,641,835; Y = 129,725 deviates from the present three-mile projection and may be described as follows:

	X	Y
By arc centered at	2702461	124148
To	2717902	114437
By arc centered at	2699815	116800
To	2711432	102737
By arc centered at	2699695	116700
To	2694008	99369
By arc centered at	2697850	117200
To	2683320	106173
By straight Line to	2682980	106621
By arc centered at	2697510	117648
To	2679799	113283
By straight line to	2679589	114135
By an arc centered at	2697300	118500
To	2679559	114260
By an arc centered at	2685250	131590
To	2677482	115086
By an arc centered at	2684417	131957
To	2673065	117679
By an arc centered at	2683850	132390
To	2672411	118182
By an arc centered at	2682580	133325
To	2671159	119102
By straight line to	2655458	117595
By arc centered at	2641835	129725

Prior to January, 1961 the three-mile projection line in East Bay vicinity from base line point X = 2,702,461; Y = 124,148 to base line point X = 2,641,835; Y = 129,725 deviates from the present three-mile projection and may be described as follows:

	X	Y
By arc centered at	2702461	124148
To	2716719	112772
By arc centered at	2699435	118600
To	2710698	104252
By arc centered at	2697850	117200
To	2683320	106173
By straight line to	2682980	106621
By arc centered at	2697510	117648
To	2679799	113283
By straight line to	2679589	114135
By an arc centered at	2697300	118500
To	2679559	114260
By an arc centered at	2685250	131590
To	2677482	115086
By an arc centered at	2684417	131957
To	2673065	117679
By an arc centered at	2683850	132390
To	2672411	118182
By an arc centered at	2682580	133325
To	2671159	119102
By straight line to	2655458	117595
By arc centered at	2641835	129725

Prior to December 6, 1969 the three-mile projection in the Pass du Bois vicinity from base line point X = 2,614,270; Y = 110,615 to base line point X = 2,608,270; Y = 178,325 deviates from the present three-mile projection and may be described as follows:

	X	Y
By arc centered at	2614270	110615
To	2597233	117130
By straight line to	2597212	152789
By arc centered at	2612771	162310
To	2595307	157043
By arc centered at	2612120	164118
To	2594046	166581
By arc centered at	2608270	178325

From November 19, 1959 to February 1, 1960 the three-mile projection in the Pass Tarte Phine vicinity from base line point X = 2,606,370; Y = 180,190 to base line point X = 2,598,335; Y = 196,450 deviates from the present three-mile projection and may be described as follows:

	X	Y
By arc centered at	2606370	180190
To	2593225	167544
By arc centered at	2602000	183535
To	2583851	185362
By arc centered at	2598335	196450

From January 1, 1959 through March 31, 1959 and from March 1, 1964 through July 31, 1964 the three-mile projection north of Pass Tante Phine from base line point X = 2,605,125; Y = 182,710 to base line point X = 2,600,780; Y = 192,900 deviates from the present three-mile projection and may be described as follows:

	X	Y
By arc centered at	2605125	182710
To	2588206	175894
By arc centered at	2602763	186885
To	2584711	184268
By arc centered at	2600780	192900

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